



Smithsonian  
*National Air and Space Museum*  
*Steven F. Udvar-Hazy Center*

**Date:** May 7, 2009

**Address** Smithsonian Institution  
National Air and Space Museum  
Steven F. Udvar-Hazy Center  
14390 Air and Space Museum Parkway  
Chantilly, Virginia 20151

**Cc:** John R. Dailey, Director, National Air and Space Museum  
Nancy Bechtol, Director, Office of Facilities Management and Reliability  
Roger Yankoupe, Director, Office of Safety, Health and Environmental  
Management  
Farleigh Earhart, Office of General Counsel

**From:** Rick Cochran, Museum Facilities Manager

**Subject:** **Response to Notice of Violation dated April 14, 2009**

This letter is in response to the Notice of Violation received from US Environmental Protection Agency, Region III ("EPA") on 14 April 2009. Included you will find the observations and legal requirements as stated in the notice of violation and our response to explain our remedy/cure for each violation and current status.

**1. Observations:** During the on-site inspection of December 3, 2008, the Facility's Main Electrical Room, the inspector observed one spent fluorescent lamp stored in an unlabeled open box in violation of 40 CFR 273.13(d)(1) and 273.14(e), which requires that spent fluorescent bulbs be accumulated in closed packaging or containers, and that each package or container be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)" or "Waste Lamp(s)", or "Used Lamp(s)".

**Smithsonian Institution Response:** On December 3, 2008, while under the observation of the inspectors, this violation was corrected. The lamp was moved into the correct container for storage and marked as stated in 40 CFR 273.13(d)(1) and 273.14(e). Previous training in the proper storage of spent lamps, and universal waste was reinforced.

The on-site operations and maintenance contractor has a Hazardous Material training program which is on-going annual training with updates as required. Last annual class was held March 25, 2009.

**2. Observations:** The EPA inspector noted that the open box of universal waste lamps was not marked or labeled with the accumulation start date in violation of 40

**CFR 273.15(c)(1), which requires that containers of universal waste be labeled with the accumulation start date.**

**Smithsonian Institution Response:** On December 3, 2008, while under the observation of the inspectors, this violation was corrected. The spent lamp was moved into the correct container for storage of universal waste lamps and the accumulation start date was put on the box in accordance with 40 CFR 273.15(c)(1). Previous training in the proper storage of spent lamps, and universal waste was reinforced. Additional training in Hazardous Materials is conducted annually with periodic updates. Last annual class was held March 25, 2009.

Please contact Rick Cochran at (703) 572-4081 or [cochranr@si.edu](mailto:cochranr@si.edu) should you have any questions regarding the content of this response.

Sincerely,



Rick Cochran  
Museum Facilities Manager  
Smithsonian Institution